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March 2, 2022

The Honorable Michael B. Kaplan  
United States Bankruptcy Court, District of New Jersey  
Clarkson S. Fisher US Courthouse  
402 East State Street, Courtroom #8  
Trenton, NJ 08608

Re: LTL Management LLC, Case No. 21-30589 (MBK)

Dear Chief Judge Kaplan:

We write to correct inaccuracies in the letter filed yesterday by Mr. Molton [Dkt. No. 1599].

First, the Debtor has not “withdrawn its nominees” of individuals to serve as the Future Talc Claimants’ Representative (“FTCR”) in this case. Rather, in its February 25, 2022 letter to the Court [Dkt. 1575], the Debtor expressed a *willingness to consent* to the selection of Randi S. Ellis as the FTCR. That TCC I is continuing to seek discovery from the Debtor’s FTCR candidates belies TCC I’s assertion that the Debtor’s candidates have been withdrawn.

Second, the Debtor did not suggest that there was an “agreement” with the Committees regarding the appointment of an FTCR. Rather, the Debtor represented (i) *its* agreement to the selection of Ms. Ellis, the Committees’ candidate, as FTCR and (ii) *its expectation* that such agreement would end any further litigation regarding the appointment of an FTCR.

The Debtor remains perplexed by the Committees’ determination to engage in wasteful discovery despite the Debtor’s agreement to their candidate and respectfully submits that the estate should not be required to bear the costs of such discovery.

Respectfully submitted,

/s/ Gregory M. Gordon  
Gregory M. Gordon